composing the new court by the lieutenant-governor in council. In other words it divests the Superior Court of part of its jurisdiction, and the substituted judges are to be appointed by the lieutenant-governor in council. If by merely calling judges "magistrates," jurisdiction can be given up to $100 to persons appointed by the lieutenant-governor in council, similarly jurisdiction can be given to any amount to persons appointed in the same way, and the judges of the Superior Court might be left with nothing to do. So, too, the provincial Court of Appeal might be replaced by a new bench styled "magistrates sitting in appeal." The provision of the B. N. A. Act, giving the Governor-General the power to appoint judges, would thus be evaded and destroyed. But while the exercise of the veto power was necessarily called for by the manner of appointment prescribed in the Act, it would be a matter for regret if the assignment of the circuit work to special judges should not be carried out. The judges of the Superior Court, for the most part, desire to be relieved from circuit court work. It will in the end effect an economy in the administration of justice, for the judges appointed to the petty court need not be paid anything like the salaries assigned to judges of the higher courts. The only thing required to settle the difficulty is that the Bill be re-enacted, leaving the appointment of the judges in the proper hands.—*Legal News.*

CHATTEL MORTGAGES.—The Supreme Court of Indiana, in *The Muncie National Bank* v. *Brown*, reported in the *American Law Register*, held a chattel mortgage valid where a notary public had, for several years, been using a seal of his own, but, in attesting the certificate of acknowledgment to the chattel mortgage involved in this action, used a seal belonging to another person. The designs of the seal were somewhat different, one of them bearing the words, "Notary Public, Seal, Indiana," the other bearing the words, "Notary Public, Delaware Co., Ind." *Held*, that the certificate was not invalidated, and that the mortgage was entitled to be admitted to record. The mistake or wrong of a public officer, in placing a seal upon a certificate of acknowledgment, is not available under an answer of general denial, where the instrument is fair and perfect on its face. A mortgagee has a right to a personal judgment and to a decree establishing his lien, although the mortgaged property is in the hands of a receiver. A description of personal property, stating in general terms its character, and specifically stating in what building and rooms it is situated, is sufficient. Under the statutes of Indiana, fraud is a question of fact, and a chattel mortgage cannot, as matter of law, be adjudged fraudulent because it contains a provision authorizing the mortgagor to dispose of the property and account to the mortgagee. A plaintiff who takes a personal judgment for the amount of his debt, does not merge the mortgage nor lose his right to subsequently foreclose it; but he may, on a subsequent day of the term, take a decree foreclosing the mortgage. A creditor who accepts a second mortgage, which expressly recites that it is subject to a prior mortgage, is estopped to attack it on the ground that it was made to defraud creditors.